

Main Identity

From: "Carlson, John" <John.Carlson@idwr.idaho.gov>
To: "Heidie Torrealday" <rockstars@atcnet.net>
Cc: "Galloway, Chuck" <Chuck.Galloway@idwr.idaho.gov>; "James D. Rush (E-mail)" <jrush@rockymountainenvironmental.com>
Sent: Wednesday, October 04, 2006 10:32 AM
Subject: RE: October 6 Draft Rules

Good Morning Heidie Torrealday:

We are disappointed you are unable to make this Friday's meeting, However, we appreciate and Mr. Rush will note your comments for consideration.

Thank you.
john carlson

-----Original Message-----

From: Heidie Torrealday [mailto:rockstars@atcnet.net]
Sent: Wednesday, October 04, 2006 8:44 AM
To: Carlson, John; Erickson, Nathan
Cc: weech@qwest.net
Subject: October 6 Draft Rules

Gentlemen,

I am not likely to be able to attend the Oct. 6 meeting, and have some serious concerns over the language under Well Seals. Forty-five lines of well-reasoned, appropriate language has been stricken to make way for Two-hundred, thirty-three lines of mostly nonsense.

Line 505 and 506: A two inch annular space, divided by two (assuming a centered, concentric fit, leaves only one inch to place a tremmie pipe. Using steel pipe with couplings, one could only fit a half-inch pipe in to act as the tremmie pipe. The four inch annulus is specifically for creating enough space to place the seal by whatever means. These new lines are a prime example of rules that are written like a set of specifications that aren't constructable.

Line 511: In many areas of the southern Snake River Plain, the water table is between 200 and 400 feet below ground surface. Coupled with line 622-623, a 20-inch well requiring a single casing reduction would have to start at least 28-inch surface diameter, and if it were 315 feet to water, 326 feet of 20-inch casing would have to be set and grouted 325 feet to land surface. Very likely, the subsurface lithology would be dominated by fractured basalt with interbedded scoria, and tabular interflow zones which would "drink up" all the grout in southern Idaho. Even if it were feasible to construct the seal in this way, (and it is definitely not), it is also unnecessary, as proximal to the well location there would still exist a myriad of natural fractures and conduits to allow infiltration of fluids vertically toward the water table. Because this language is pervasive in this new section, I advise to strike all, return to the existing rule with minor modification. The temporary casing string should be two pipe sizes larger than the first permanent casing string, e.g. a 24-inch temporary casing for a 20-inch permanent casing, sealed to a minimum depth of 18 feet, where the 20-casing would extend a minimum of one foot above grade and the surrounding area be graded away in all directions adjacent to the casing. Line 815-816: Implies that a well not meeting the new standard would have to be modified or abandoned. Just to clarify, if a well is not allowing waste or contamination, it would not be required to be modified retroactively?

Line 913 and 930: I take issue with being told "how" to construct and install instead of "what" to install. There is no reason not to be able to use a torch to cut pitless adapter hole so long as the hole is tightly fit to the adapter, and free of slag burrs. I request removal of these two lines, and language in general that prescribes methodology for any task.

Line 1041: I believe the values in this table to be too stringent. It is agreed that sand production is harmful to the end use, the pump, and in extreme cases, to the aquifer itself. These values however, are so small as to make compliance and enforcement hard to achieve. I propose to double each quantity, or to refer to an existing DEQ standard for the applicable end use.

Thank you for your attention to these concerns. Please bring these comments forward in my stead if I am unable to attend Friday's meeting. Thank You,

Alan

Heidie I Torrealday, Geologist

or

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